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**Sent:** 9/10/2018 7:09:25 PM  
**To:** Wu, Jennifer [Wu.Jennifer@epa.gov]  
**CC:** Franklin, Richard [Franklin.Richard@epa.gov]; Moon, Wally [Moon.Wally@epa.gov]; Kenknight, Jeff [Kenknight.Jeff@epa.gov]; Levo, Brian [Levo.Brian@epa.gov]; Poulsom, Susan [Poulsom.Susan@epa.gov]; Weber, Courtney [Weber.Courtney@epa.gov]  
**Subject:** FW: Pre-draft NPDES permit and fact sheet for WA hydros  
**Attachments:** 090718\_Dalles\_WA0026701\_pre\_draft\_permit\_v1.docx; 090818\_Lower\_Columbia\_dams\_pre-draft\_v1\_Fact\_Sheet.docx; SOP 200-1-1 Oil Accountability Program 4.21.15.pdf

Hi Jenny:

I was only able to do a quick triage of some key draft permit provisions in light of your deadline and my other work so apologies for the brevity and summary nature of these comments. I realize the draft permit incorporates already various OWW/NPU policy judgments and determinations that I am not aware of so these are only my comments – not been reviewed and or endorsed by ECL or OCE – and I am not arguing for policy changes but more do issue spotting for your further review and consideration.

**Limit Tables, O&G Limit.**

**Ex. 5 Deliberative Process (DP)**

Revise for consistency.

**O&G Limit Versus Sheen.** Should the fact sheet cite and discuss any scientific/technical basis that the chosen numeric O&G effluent limit does in fact protect against or ensure no visible oil sheen (i.e., is consistent with sheen prohibition found in the GP, Part I.b).4., page 6)?

**O&G Limit – Monthly Average or Daily Maximum?** The GP tables and fact sheet seem to suggest it is intended to be a monthly average. That seems odd to me so I ask whether you intended it to be a Daily Maximum(?). If you go with a Monthly Average (allowing permittee to theoretically take unlimited samples), don't you set up a theoretical possibility that the permittee could violate the visible oil sheen prohibition on certain days but demonstrate in that same month, compliance with the monthly average limit? I generally understood that a daily maximum limit for O&G would be based on determination it would be consistent with ensuring no visible sheen (?). What did Region 10 end up with in the Idaho GP for limit – mon ave or daily max?

**Tables' Visual Observation – For Sheen? & What Frequency?** Did you intend that the Visual Observation include visible oil sheen? Not sure whether "floating" gets to that issue (arguably) but to make it clear, should it state oil sheen? Maybe my oversight but what minimum frequency is required for Visual Observation? Does permit (or should permit) require permittee to record all visual observations of water surface regardless of meeting minimum frequency?

**App B – Para. No. 2 – Prevention?** Opening No. 2 paragraph is about minimize and minimization but some following elements refer to prevention . . . does it help or make any difference if the text emphasis is on prevention?

**App. B – Para. No 3, Oil Accountability & Tracking – required follow-up?** Again, apologies if I missed something like this comment or you all made a related policy decision. One of the key elements of the OAP currently made available to us was the Response Actions or investigation steps that were triggered after the identification of some loss of oil based on their Tracking methods. While tracking method is important first step, the real accountability occurs when the permittee is activated to follow-up on tracking results that show something amiss. I am not sure leaving corrective/investigative actions to chance, even if expected, is really a

permit designed for prevention that has some enforcement teeth(?). In sum, should the permit include some provision requiring the BMP Plan to describe what happens if tracking identifies a situation (however defined), like an identified loss-of-oil from their inventory tracking?

Thanks for the opportunity to review.

Rick

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**From:** Wu, Jennifer  
**Sent:** Sunday, September 09, 2018 4:32 PM  
**To:** Cool, Richard <Cool.Richard@epa.gov>  
**Cc:** Franklin, Richard <Franklin.Richard@epa.gov>  
**Subject:** Pre-draft NPDES permit and fact sheet for WA hydros

Hi Rick (cc: Richard),

Here is a copy of the pre-draft NPDES permit for The Dalles dam and Fact Sheet for the Lower Columbia River dams. Please check out the language on BMPs for oil minimization, equipment maintenance, and other measures in the permit. These are best laid out in Appendix B in the permit. Part II.C requires the facility to use environmentally acceptable lubricants (EALs).

I'm very open to adding detail to the permit especially re: the oil accountability program or other minimization measures you think are important.

If you're able to send comments by mid-week, that would be very helpful. However, don't hesitate to let me know if you need more time, as this is a short turnaround.

Thanks!

Jenny Wu

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